

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:

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CHAPTER 11

CASE NO. 20-33948 (MI)

FIELDWOOD ENERGY LLC, *et al*¹

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(Jointly Administered)

Debtor

JOINDER AND RESERVATION OF RIGHTS OF PARTCO, LLC
TO BEDROCK PETROLEUM CONSULTANTS, LLC'S LIMITED OBJECTION TO
DIP FINANCING AND CASH COLLATERAL MOTION
[RELATES TO DKT. NOS. 22 AND 192]

Comes now Partco, LLC (“**Partco**”) by and through its undersigned counsel, and files this joinder and reservation of rights to the limited objection filed by Bedrock Petroleum Consultants, LLC (“**Bedrock**”) to the *Emergency Motion of Debtors for Interim and Final Orders (i) Authorizing Debtors (a) to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363(b), 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1) and 364(e) and (b) to Utilize Cash Collateral Pursuant to 11 U.S.C. § 363, (ii) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 361, 362, 363, 364 and 507(b) and (iii) Scheduling Final Hearing [docket no. 22] (the “DIP Motion”)*. in support of this reservation of rights, limited objection and joinder, Partco offers the following:

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC(6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOW Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (042). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

FACTUAL BACKGROUND

1. The Debtors are oil and gas exploration and production companies in the Gulf of Mexico.
2. Partco is an oil and gas services company, which performed labor and/or sold or furnished goods and materials at the request of the Debtors.
3. As of the date of this Limited Objection, the Debtors owe Partco at least \$211,666.24 for contracted services provided prior to the petition date. Copies of invoices itemizing these amounts are available upon request to undersigned counsel. Partco reserves the right to recover interest, attorneys' fees, and other allowed costs.
5. Partco has or is entitled to assert and perfect mineral liens against certain of the Debtors' assets pursuant to 11 U.S.C. 546(b), LA. R.S. §§ 9:4861 to 9:4889, and other applicable law. Such secured claims may be asserted against the Debtors' and/or third parties' interests in wells or other mineral assets and relate back to the time goods or services are provided. Accordingly, Partco is preserving its mineral lien rights pursuant to section 546(b) of the Bankruptcy Code.

JOINDER TO LIMITED OBJECTION

6. Partco joins the limited objection filed by Bedrock Petroleum Consultants, LLC [Dkt. No. 192], filed in response to the DIP Motion, in its entirety, as if fully set out herein, insofar as the same relates to the interests held by Partco. Partco asks that it also be listed in the proposed language.
7. Based on the foregoing, Partco reserves its rights to object to the entry of the Final DIP Order, absent the proposed order including provisions requested by Bedrock relating to the preservation of rights and remedies regarding statutory oil and gas mechanic's and materialman's liens.

RESERVATION OF RIGHTS

8. Partco expressly reserve its rights to raise these objections and any other such objections, or to join in any other objections relating to the DIP Motion, at any time prior to the hearing considering the DIP Motion on a final basis, regardless of whether Bedrock's limited objection is resolved prior to such hearing.

WHEREFORE, PREMISES CONSIDERED, Partco prays the Court grants it the relief requested herein, and the Court order such other and further relief the Court deems just and proper.

Respectfully Submitted by:

STEWART ROBBINS BROWN & ALTAZAN, LLC

By: /s/ William S. Robbins

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Attorneys for Partco, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of August, 2020, a true and correct copy of the foregoing ***Joinder and Reservation of Rights of Partco, LLC to Bedrock Petroleum Consultants, LLC's Limited Objection to DIP Financing and Cash Collateral Motion [Related to Dkt. Nos. 22 and 192]*** was sent via ECF Noticing to all parties registered to receive CM/ECF Notices in this adversary proceeding.

/s/ William S. Robbins
William S. Robbins